

1 LYSSA S. ANDERSON
2 Nevada Bar No. 5781
3 RYAN W. DANIELS
4 Nevada Bar No. 13094
5 KRISTOPHER J. KALKOWSKI
6 Nevada Bar No. 14892
7 KAEMPFER CROWELL
8 1980 Festival Plaza Drive, Suite 650
9 Las Vegas, Nevada 89135
10 Telephone: (702) 792-7000
11 Fax: (702) 796-7181
12 landerson@kcnvlaw.com
13 rdaniels@kcnvlaw.com
14 kkalkowski@kcnvlaw.com

15 ***Attorneys for Defendants***

16 ***Las Vegas Metropolitan Police Department,
Joseph Lombardo, Jennifer Wood and
Doris Hearrington (erroneously sued as Doris Hearington)***

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 CHARLES HAYES ,

20 Case No.: 2:20-cv-02048-KJD-BNW

21 Plaintiff,

22 vs.

23 **STIPULATION TO STAY DISCOVERY
[ECF No. 17]**

24 LAS VEGAS METROPOLITAN POLICE
25 DEPARTMENT, et al.

26 Defendants.

27
28 Defendants Las Vegas Metropolitan Police Department, Joseph Lombardo, Jennifer
29 Wood, and Doris Hearrington (“LVMPD Defendants”), by and through their counsel, Kaempfer
30 Crowell, and Plaintiff Charles Hayes (“Plaintiff”), by and through his Counsel Na’Shaun L. Neal
31 of PLC Law Group, hereby stipulate as follows:

32 ///

33 ///

1 1) Discovery shall be stayed pending ruling on the Plaintiff's Motion for
2 Multidistrict Litigation Treatment ("MDL Motion"), [ECF No. 20];

3 2) The discovery stay shall include all discovery including serving and responding to
4 any written discovery (e.g., Interrogatories, Requests for Production of Documents, Requests for
5 Admissions, Third-Party Subpoenas), taking any depositions, and the disclosure of any expert
6 and rebuttal expert reports.

7 3) The parties agree that the stay shall also extend to the deadline to file dispositive
8 motions.

9 4) The parties will submit a new proposed Discovery Plan to the Court within 14
10 days of a ruling on Plaintiff's MDL Motion and, upon the Court approving the Discovery Plan,
11 the stay will be lifted. The new Discovery Plan will include deadlines to amend pleadings,
12 designate experts, conduct discovery, and file dispositive motions.

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

1 5) The stay is only affecting this instant case and has no bearing upon the Eastern
2 District of California matter. *See Hayes v. Kern County*, 1:19-cv-0 1722-JLT.

3 DATED this 8th day of April, 2021.

4 KAEMPFER CROWELL

PLC LAW GROUP

5
6 By: /s/ Ryan W. Daniels
7 LYSSA S. ANDERSON (5781)
8 RYAN W. DANIELS (13094)
9 KRISTOPHER J. KALKOWSKI
10 (14892)
11 1980 Festival Plaza Drive, Ste 650
12 Las Vegas, Nevada 89135

13
14 *Attorneys for Defendants*
15 *Las Vegas Metropolitan Police*
16 *Department, Joseph Lombardo,*
17 *Jennifer Wood and Doris*
18 *Hearrington*

19
20 By: /s/ Na'Shaun L. Neal
21 Na'Shaun L. Neal (*Pro Hac Vice*)
22 3756 Santa Rosalia Dr., Ste. 326
23 Los Angeles, CA 90008

24 – AND –

25
26 Jordan P. Schnitzer (10744)
27 THE SCHNITZER LAW FIRM
28 9205 W. Russell Rd., Ste. 240
29 Las Vegas, NV 89148

30
31 *Attorneys for Plaintiff Charles Hayes*

32
33 **ORDER**

34
35 IT IS ORDERED that on the basis of good cause the parties' stipulation is GRANTED.
36 Discovery in this matter is STAYED pending a decision on plaintiff's motion for multidistrict
37 litigation ("MDL") treatment. The deadline for dispositive motions is likewise stayed. And
38 the parties' proposed discovery plan and scheduling order is due 14 days after a decision
39 on plaintiff's MDL motion. Finally, this stay affects the instant case only.

40
41 IT IS FURTHER ORDERED that a joint status report concerning the status of the MDL
42 motion is due on 7/13/2021 and every three months thereafter.

43
44 **IT IS SO ORDERED**

45
46 **DATED:** 12:22 pm, April 13, 2021

47
48 

49
50 **BRENDA WEKSLER**
51 **UNITED STATES MAGISTRATE JUDGE**